

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

DENNIS DIMON,

Plaintiff,

VS.

**METROPOLITAN LIFE
INSURANCE COMPANY, KEMPER
INSURANCE COMPANY,
MORGAN STANLEY DW, INC.,
MICHAEL B. LATTI, LATTI
ASSOCIATES, and LATTI &
ANDERSON LLP,**

Defendants.

C. A. No: 05-11073 MEL

**DEFENDANT METROPOLITAN LIFE INSURANCE COMPANY’S
RULE 26(a)(3) DISCLOSURES**

Defendant, Metropolitan Life Insurance Company (“MetLife”), provides the following required pretrial disclosures:

A. Individuals Likely to Be Called to Testify:

1. Dennis J. Dimon
Plaintiff
c/o David Kaplan, Esquire
2. Barbara Fasman
c/o James Ciapciak, Esquire
3. Katherine Dimon
c/o David Kaplan, Esquire
4. Michael Latti
c/o Jed DeWick, Esquire

Individuals Likely to Be Called If the Need Arises:

1. John Noe
73 Old Stonehouse Road
Bedminster, NJ 07921
2. Roger Hughes
Hughes & Associates
46 Accord Park Drive
Norwell, MA 02061
3. Leonard Decof
Decof & Decof, P.C.
One Smith Hill
Providence, RI 02903

MetLife reserves the right to call any witness listed by any other party in its Pretrial Disclosure or add additional witnesses as revealed through further discovery.

B. Designation of Deposition Testimony:

MetLife does not intend at this time to present any testimony by means of a deposition.

C. Expected Exhibits:

1. A copy of correspondence, dated July, 14, 1983, from Barbara Boehm to Mr. Kurt Snyder;
2. A copy of correspondence, dated August 12, 1983, from John L. Noe to Mr. Robert A. Foley;
3. A copy of correspondence, dated September 26, 1983, from Robert Liguori to Mr. John L. Noe;
4. A copy of correspondence, dated October 10, 1983, from John L. Noe to Robert Liguori;
5. A copy of correspondence, dated October 14, 1983, from Barbara Boehm to Mr. John Noe;
6. A copy of correspondence, dated October 12, 1983, from John L. Noe to Ms. Barbara Boehm;

7. A copy of an annuity application signed by John L. Noe and Dennis Dimon on or about May 4, 1983;
8. A copy of the Supplementary Agreement issued by Charter Security Life Insurance Company to Dennis Dimon indicating a "240 Month" Term;
9. A copy of correspondence, dated September 24, 1999, from Teresa Thorp to Dennis Dimon;
10. A copy of correspondence, dated July 9, 2003, from Sandy Franklin to Dennis Dimon; and
11. A copy of an additional correspondence, dated July 9, 2003, from Sandy Franklin to Dennis Dimon.

Respectfully submitted by,
METROPOLITAN LIFE INSURANCE
COMPANY,
By its Attorneys,

/s/ Peter M. LeBlanc
James J. Ciapciak, BBO #: 552328
Peter M. LeBlanc, BBO # 645302
CIAPCIAK & ASSOCIATES, P.C.
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Norwood, MA 02062
Tel: (781) 255-7401
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CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing document was filed via the ECF system and will be served electronically through that system upon Counsel of Record on June 9, 2007.

/s/ Peter M. LeBlanc
Peter M. LeBlanc